

# COMMUNICATIONS ADVISORY COUNSEL LLC

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September 28, 2007

***Via electronic filing***

Marlene Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

Re: South Canaan Cellular Communications Company, LP  
CC Docket No. 94-102  
Status Report and Request for Waiver Extension, to the Extent Necessary

Dear Madam Secretary:

Pursuant to the Commission's *Order*,<sup>1</sup> South Canaan Cellular Communications Company, LP ("South Canaan") was granted an extension of time until September 30, 2007 within which to meet the 95% ALI-compliant handset penetration requirement established by Section 20.18(g)(1) of the Commission's Rules.<sup>2</sup> South Canaan reports a total penetration rate today of 94%. South Canaan has shipped compliant phones to an additional one percent of its customers who currently hold analog phones. On Monday, October 1, 2007, those phones will be activated and, pursuant to the customers' instructions, their analog phones will be de-activated, resulting in full compliance with the 95% penetration rate. Out of an abundance of caution, South Canaan requests a brief extension of time, through and including October 1, 2007, within which to meet the 95% penetration rate, to the extent that such an extension is deemed necessary.

Please contact the undersigned if you have any questions regarding this report or request.

Respectfully submitted,



Sylvia Lesse  
Counsel for South Canaan  
Cellular Communications Company, LP

cc: \* Jeff Cohen, Public Safety & Homeland Security Bureau, FCC  
Mr. Bernie Swartwood, Pike County Communications  
Mr. Marty Hedgelon, Wayne County E911 Coordinator

\*via electronic mail

<sup>1</sup> *In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, DA 07-1217 (rel. Mar.9, 2007) ("Order").

<sup>2</sup> 47 C.F.R. §20.18(g)(1).